



Signed and Filed: December 28, 2020

DENNIS MONTALI
U.S. Bankruptcy Judge

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION BY AND
BETWEEN REORGANIZED
DEBTORS AND CARA FENEIS**

1 The Court having considered the *Stipulation By and Between Reorganized Debtors and*
2 *Cara Feneis*, dated December 28, 2020 [Dkt. No. 9916] (the “**Stipulation**”),¹ entered into by
3 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
4 debtors and reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the
5 Plan, the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on
6 the one hand, and Cara Feneis (“**Feneis**”, and, together with the Debtors and Reorganized Debtors,
7 the “**Parties**”), on the other hand; and pursuant to such Stipulation and agreement of the Parties,
8 and good cause appearing,

9 IT IS HEREBY ORDERED THAT:

10 1. The Stipulation is approved.

11 2. Effective as of February 1, 2021, the Plan Injunction shall be modified solely to
12 permit Feneis to liquidate the claims asserted in the Proof of Claim by prosecuting the State Court
13 Action against the Utility through final judgment and any appeals thereof provided, however, that
14 this Order is shall not affect or modify (a) the applicability of the Plan Injunction in any other
15 respect, or (b) the rights or obligations of the Parties under the Plan and the Confirmation Order
16 with respect to enforcement of any judgment or any other matter not expressly addressed herein.

17 3. Upon the modification of the Plan Injunction described in paragraph 2 above, and no
18 later than February 10, 2021, Feneis shall dismiss the Superior Court Lawsuit with prejudice as to
19 DOES 1-20.

20 4. Feneis shall not sue any current or former employees of either of the Reorganized
21 Debtors, or any affiliate of either of them, in the State Court Action or in any other action or
22 proceeding, on any of the claims alleged in the State Court Action, the Complaint, the Proof of
23 Claim, or on any other claims based on or arising from the same or materially the same common
24 nucleus of facts, events, and circumstances alleged in the State Court Action, the Complaint, or
25 the Proof of Claim.

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27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

1 5. Nothing herein shall be construed to be:

- 2 a. a waiver by the Debtors or the Reorganized Debtors, as applicable, or any other
3 party in interest, of any right to object to the Proof of Claim on any grounds, or
4 b. a waiver by Feneis of her rights to assert any right in opposition of any asserted
5 challenge to the Proof of Claim, or
6 c. a waiver by any Party of any claim or defense in the State Court Action.

7 6. By entry of this Order, the Motions are deemed withdrawn with prejudice, and the
8 Hearing is vacated.

9 7. The Stipulation is binding on the Parties and each of their successors in interest.

10 8. The Stipulation constitutes the entire agreement and understanding of the Parties
11 relating to the subject matter thereof and supersede all prior agreements and understandings relating
12 to the subject matter thereof.

13 9. This Court shall retain jurisdiction to resolve any disputes or controversies arising
14 from the Stipulation or this Order.

15 *** END OF ORDER ***

16 Approved.

17 Dated: December 28, 2020

18 PERETZ & ASSOCIATES
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21 /s/ Yosef Peretz
Yosef Peretz, Esq.

22 Attorneys for Cara Feneis
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